

## UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America

v.

Case No. 2:21-mj-83

TRAVIS MICHAEL FLYNN

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/4/2021 through 10/28/2021 in the county of Charleston in the  
South Carolina District of South Carolina, the defendant(s) violated:

## Code Section

## Offense Description

21 USC 841(a)(1)

Possession with Intent to Distribute Methamphetamine and Fentanyl

21 USC 846

Conspiracy to Possess with Intent to Distribute Methamphetamine and Fentanyl

This criminal complaint is based on these facts:

See Affidavit of DEA TFO Justin Garrison, dated October 29, 2021

☒ Continued on the attached sheet.


Complainant's signature

DEA TFO Justin Garrison

Printed name and title

Sworn to me via telephone or other reliable electronic means  
 and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d)

Date: 10/29/2021City and state: Charleston, South Carolina


Judge's signature

United States Magistrate Judge Mary Gordon Baker

Printed name and title

**AFFIDAVIT**

This affidavit is submitted in support of a criminal complaint charging ANTIONE MAURICE FRANKLIN and TRAVIS MICHAEL FLYNN with conspiracy to distribute methamphetamine in violation of 21 U.S.C. Sec. 846. and possession with the intent to distribute methamphetamine in violation of 21 U.S.C. Sec. 841 (a).

**Your Affiant:** Your affiant, Justin Garrison, Task Force Officer (TFO) of the Drug Enforcement Administration (DEA), United States Department of Justice, being duly sworn, depose and say that I am an investigative or law enforcement officer of the United States within the meaning of Section 2510 (7) of Title 18, United States Code (U.S.C.); that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 21, United States Code. Your affiant, TFO Garrison, is and has been a sworn member of the North Charleston Police Department since January 2014 and a TFO with the Drug Enforcement Administration since June 2021. Your affiant has been assigned to the currently assigned to the Charleston Resident Office since June 2021. Your affiant has participated in investigations into unlawful importation, possession with intent to distribute controlled dangerous substances (CDS), distribution of CDS, the laundering of monetary instruments, monetary transactions in property derived from specified unlawful activities and the associated conspiracies in violation of Title 21, United States Code, Sections 841, 843, and 846. Your affiant has participated in numerous drug investigations since being assigned to the Drug Enforcement Administration, and through personal experience in investigating drug traffickers, has become familiar with methods used by traffickers to distribute controlled dangerous substances and also the methods they use to contact their sources of supply and customers. Your affiant has authored numerous affidavits for arrest warrants and search warrants. Your affiant has

also participated in numerous executions of Federal and State search warrants and arrest warrants. TFO Garrison has also testified as a witness in State criminal proceedings regarding narcotics trafficking investigations.

**Facts and Circumstances:**

On October 4, 2021, the DEA and United States Postal Inspection Service (USPIS) identified USPS parcel bearing Tracking Number EJ558624184US enroute from Los Angeles, California to 3100 Conservancy Lane in Charleston, SC. USPS identified USPS parcel bearing Tracking Number EJ558624184US was being tracked by a specific telephone number that also had tracked 10 additional USPS parcels that originated in Los Angeles, California beginning in August 8, 2021 that were previously delivered to 3100 Conservancy Lane in Charleston, SC. On October 12, 2021, a federal search warrant was executed on USPS parcel bearing Tracking Number EJ558624184US resulting in the seizure of approximately 967.3 grams (nearly 1 kilogram) of methamphetamine, 158 suspected fentanyl pills and 37 grams of marijuana.

On October 14, 2021 the DEA and USPIS identified USPS parcel bearing Tracking Number EJ558624119US enroute from Los Angeles, California to 3100 Conservancy Lane in Charleston, SC. USPS parcel bearing Tracking Number EJ558624119US was also being tracked by the same telephone number that tracked USPS parcel bearing Tracking Number EJ558624184US which was found to contain methamphetamine, fentanyl and marijuana. Surveillance of 3100 Conservancy Lane in Charleston, SC was established and observed USPS parcel bearing Tracking Number EJ558624119US delivered and left on the front porch. Approximately 8 minutes later, FRANKLIN arrived in a rental vehicle. Subpoena results revealed that the rental vehicle



was assigned to FRANKLIN and was due to be returned on October 15, 2021.

FRANKLIN approached the front porch of 3100 Conservancy Lane in Charleston, SC and took possession of USPS parcel bearing Tracking Number EJ558624119US.

FRANKLIN placed the parcel into his rental vehicle and departed. Surveillance was maintained as FRANKLIN traveled to 111 Residence Lane, Apartment 101 in Charleston, SC 29414. FRANKLIN entered the apartment and was observed on the screen porch talking on a cellular telephone.

On October 16, 2021 the DEA and USPIS identified USPS parcel bearing Tracking Number 9505 5145 2347 1287 5699 92 enroute from Los Angeles, California to 3100 Conservancy Lane in Charleston, SC. USPS parcel bearing Tracking Number 9505 5145 2347 1287 5699 92 was also being tracked by the same telephone number that tracked USPS parcel bearing Tracking Number EJ558624184US which was found to contain methamphetamine, fentanyl and marijuana as well as USPS parcel bearing Tracking Number EJ558624119US that FRANKLIN was observed obtaining on October 14, 2021. Surveillance of 3100 Conservancy Lane in Charleston, SC was established and observed USPS parcel bearing Tracking Number 9505 5145 2347 1287 5699 92 delivered. FRANKLIN arrived in a rental vehicle and took possession of USPS parcel bearing Tracking Number 9505 5145 2347 1287 5699 92 and placed the parcel into his rental vehicle. Surveillance was maintained as FRANKLIN traveled to 111 Residence Lane, Apartment 101 in Charleston, SC 29414 where he was observed entering the apartment with USPS parcel bearing Tracking Number 9505 5145 2347 1287 5699 92.

On October 2021, DEA met with a Berkeley County Confidential Informant (CI). The CI described FRANKLIN as a methamphetamine distributor. The CI has purchased

methamphetamine from FRANKLIN and FRANKLIN has offered to sell the CI methamphetamine in quantities from 1 ounce to 1 pound. On October 20, 2021, DEA utilized the CI to conduct a controlled purchase of approximately 1 ounce of methamphetamine from FRANKLIN. FRANKLIN directed the CI to the Harris Teeter located at 3865 West Ashley Circle in Charleston, SC 29414. The location of the Harris Teeter is in close proximity to FRANKLIN's apartment located at 111 Residence Lane, Apartment 101 in Charleston, SC 29414.

On October 28, 2021 the DEA and USPIS identified USPS parcel bearing Tracking Number EJ968354845US enroute from Los Angeles, California to 3100 Conservancy Lane in Charleston, SC. USPS parcel bearing Tracking Number EJ968354845US was also being tracked by the same telephone number that tracked USPS parcel bearing Tracking Number EJ558624184US (which was found to contain methamphetamine, fentanyl and marijuana) as well as USPS parcel bearing Tracking Number EJ558624119US that FRANKLIN was observed obtaining on October 14, 2021 and USPS parcel bearing Tracking Number 9505 5145 2347 1287 5699 92 that FRANKLIN was observed obtaining on October 16, 2021. USPIS identified that FLYNN arrived at the US Post Office located 1964 Ashley River Road, Charleston, SC 29407 inquiring about the location of USPS parcel bearing Tracking Number EJ968354845US and requested to pick up the parcel. FLYNN departed the Post Office without the parcel because DEA and USPIS seized USPS parcel bearing Tracking Number EJ968354845US and applied for a federal search warrant authorizing the search of the parcel. Surveillance of FRANKLIN was established at his apartment located at 111 Residence Lane, Apartment 101 in Charleston, SC 29414. FRANKLIN departed the apartment and was

ultimately encountered by investigators. FRANKLIN was advised of his Miranda Rights and agreed to speak to investigators without an attorney present. FRANKLIN admitted to being a co-conspirator with FLYNN in the distribution of methamphetamine.

FRANKLIN also identified an unmarked photograph of FLYNN as well FLYNN's telephone number and text messages with FLYNN. FRANKLIN also consented to a search of his apartment located at 111 Residence Lane, Apartment 101 in Charleston, SC 29414. DEA searched the apartment and located marijuana, however FRANKLIN was moving from the apartment and was not planning to return after October 29, 2021.

While investigators were interviewing FRANKLIN, the federal search warrant of USPS parcel bearing Tracking Number EJ968354845US was executed resulting in the seizure of approximately 467.9 grams of methamphetamine and 60 suspected fentanyl pills.

On October 28, 2021. FRANKLIN conducted a recorded telephone call to FLYNN at the direction of investigators. FRANKLIN reported to FLYNN that the USPS parcel bearing Tracking Number EJ968354845US had arrived. FLYNN agreed to meet with FRANKLIN and admitted to FRANKLIN that he was in possession of an additional quantity of methamphetamine (referring to the quantity of drugs FLYNN had left as "2 to 3") and that he would hold USPS parcel bearing Tracking Number EJ968354845US. FLYNN later sent a text message to FRANKLIN that he was "going to pay you and re-up" referring to acquiring additional methamphetamine. FRANKLIN and FLYNN exchanged a series of text messages arranging to meet at the mailboxes at FRANKLIN's apartment complex.




On the evening of October 28, 2021, surveillance observed FLYNN conduct what investigators identified as hand to hand drug transactions. FLYNN departed the apartment located at 1751 Dogwood Road, Apartment 6 Charleston, SC 29414 on 2 separate occasions and walk to the parking lot to conduct the transactions. FLYNN was then observed meeting with a female and the two departed 1751 Dogwood Road, Apartment 6 Charleston, SC 29414 and traveled to the mailboxes at FRANKLIN's apartment complex. Investigators approached FLYNN and the female. A search of FLYNN's vehicle resulted in the seizure of approximately 46 grams of methamphetamine, drug paraphernalia, US currency and a magazine for a semi-auto handgun. The female was advised of her Miranda Rights and agreed to speak to investigators without an attorney present. The female admitted to buying and using methamphetamine in the past and that she knew that FLYNN also used methamphetamine. The female stated that FLYNN lived at 1751 Dogwood Road, Apartment 6 Charleston, SC 29414 and the female had been inside of the apartment in the last several days and observed drug paraphernalia and a large amount of US currency. FLYNN was advised of his Miranda Rights and agreed to speak to investigators without an attorney present. FLYNN admitted to being a co-conspirator with FRANKLIN in the distribution of methamphetamine. FLYNN admitted to selling drugs from 1751 Dogwood Road, Apartment 6 Charleston, SC 29414 prior to travelling to meet FRANKLIN and being encountered by investigators (the two hand to hand transactions observed by investigators). FLYNN described that he lives at 1751 Dogwood Road, Apartment 6 Charleston, SC 29414. FLYNN also admitted that drugs and drug paraphernalia were in the apartment located at 1751 Dogwood Road, Apartment 6 Charleston, SC 29414.

On October 28, 2021, investigators executed a federal search warrant at 1751 Dogwood Road, Apartment 6 Charleston, SC 29414, the residence of FLYNN. Inside the residence, investigators seized approximately 195 grams of methamphetamine, 35 grams of cocaine, 44 grams of suspected heroin and 42 grams of pills.

Based on the foregoing facts and circumstances, your affiant believes that there is probable cause to believe that ANTIONE MAURICE FRANKLIN and TRAVIS MICHAEL FLYNN conspired with others to distribute methamphetamine in violation of 21 U.S.C. Sec. 846 and did possess with the intent to distribute methamphetamine, a Schedule II drug, in violation of 21 U.S.C. Sec. 841 (a).

Your affiant has signed this document under oath, as to all assertions and allegations contained herein, and states that its contents are true and correct to the best of his knowledge.

This affidavit has been reviewed by AUSA Whit Sowards.

  
Justin Garrison, Task Force Officer  
Drug Enforcement Administration

SWORN TO ME VIA TELEPHONE OR  
OTHER RELIABLE ELECTRONIC MEANS  
AND SIGNED BY ME PURSUANT TO  
FED. R. CRIM. P. 4.1 AND 4(d) OR 41(d)(3),  
AS APPLICABLE

This 29TH day of October, 2021  
Charleston, South Carolina

  
The Honorable Mary Gordon Baker  
UNITED STATES MAGISTRATE JUDGE